

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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S.M., a minor, by and through her Parents,  
C.M. and D.M., and C.M. and D.M. individually;  
K.A., a minor, by and through her parent, N.A.,  
And N.A. individually; M.S., a minor, by and  
through her parent, S.C., and S.C. individually;  
K.F., a minor, by and through her parent, C.F.,  
And C.F. individually; C.S. a minor by and through  
Her parent, S.S., and S.S. individually; D.A., a  
Minor by and through her parent, E.A., and E.A.  
individually; R.H., a minor by and through his  
parent, J.H., and J.H. individually

Plaintiffs,

vs.

Case No.21-cv-12707  
Hon. Mark A. Goldsmith  
Mag. Kimberly G. Altman

BLOOMFIELD HILLS SCHOOL DISTRICT,  
PATRICK WATSON and CHARLIE  
HOLLERITH in their individual and official  
Capacities

Defendants.

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**FIRST AMENDED COMPLAINT AND JURY DEMAND**

NOW COMES Plaintiffs by and through their attorneys, Mungo & Mungo at Law, PLLC., and for their complaint against the above-named Defendants, state as follows:

**PRELIMINARY STATEMENT**

1. This Civil Rights lawsuit is pursued on behalf of seven (7) African American students, ages 14-16, who attend Bloomfield Hills High School, and on behalf of their parents, who have and will continue to experience serious, intentional, malicious, and racist pronouncements and threats of death and bodily injury at Bloomfield Hills High School (BHHS). Defendant Bloomfield Hills School District (BHSD) fails to provide African American students and their parents with a safe, healthy and non-discriminatory learning and general environment. Said intentional and malicious threats primarily took place at Bloomfield Hills High School (BHHS) some of which were otherwise associated with teachers, staff, and other students at BHHS in violation of federal and state law.

2. These threats include, but are not limited to, the racist effigy by a White student hanging a Black doll by a noose and upon information and belief (according to a video circulating among the African American Students), later dragging it down a hallway in the school; school graffiti urging viewers to “Kill all

niggers!!” and stating “All niggers should be dead;” and social media posts and videos including the statements “I hate niggers,” “I love seeing White men kicking niggers asses,” and “I hate niggers [sic] they need to be extinguished,” and other verbal and written threats of physical harm and death to African Americans. Photographs evidencing these threats are reproduced in the appendix to this complaint.

3. Plaintiffs and other BHHS African American students and their parents repeatedly brought these threats and other racially derogatory communications to the attention of teachers, staff, the principal of BHHS, and the Superintendent of the Bloomfield Hills School District (BHSD) and repeatedly asked the Defendants to put a stop to the ongoing racial harassment, discrimination, and threats of physical harm and death based upon Plaintiff’s race (African American). Plaintiffs and other African American students and their parents also repeatedly requested Defendants to investigate these incidents and find the perpetrators of same to ensure Plaintiffs and other BHHS African American Students and their parents and other students of color a safe learning environment at BHHS. Defendants to this date has not taken adequate action to secure a safe discriminatory and racist free learning environment for Plaintiffs, other students of color and their parents.

4. Defendants on at least one occasion, as reported by the Bloomfield



Township Police (BTP) Chief at the December 16, 2021, Bloomfield Hills School Board meeting, in an apparent attempt to conceal and protect at least one perpetrator responsible for the ongoing racist threats of physical harm and death to African Americans, erased the written racist threat from the wall denying the police department an opportunity to perform a forensic analysis of the handwritten threat. ( <https://youtu.be/BDPoMPHv0vk> “BHSD Board Meeting Video”. See at 1:09:55- 1:10:19 Time mark)

5. At all relevant times, S.M. was a student at BHHS, and Defendants had duties to protect all students at the school and take action to mitigate circumstances interfering with students’ ability to learn.

6. Plaintiffs and other African American students and parents repeatedly asked Defendants for information concerning the Defendants’ investigation of these incidents. Defendants’ responses were evasive, incomplete, and misleading. On some occasions, Defendants did not respond at all.

7. Upon information and belief, Defendants failed to conduct a minimally satisfactory investigation or initiate any investigation of these racially motivated acts of hate at all.

8. Defendants above-described failures takes place in the context of a national and local climate of fear associated with the killing and injury of people of color by White vigilantes and others. No responsible parent can dismiss or take



lightly any of the threats described in the preceding paragraphs and the paragraphs that follow. When racists threaten to kill, their threats should be taken most seriously.

9. At all relevant times up to the present, Defendants have failed to take any meaningful steps to ensure the safety of Plaintiffs and other students of color or to change an educational environment of fear and racial discrimination.

10. Defendant's failure to exercise their duty of care extends beyond the school building to other areas under their control, such as school buses and school sponsored athletic events.

11. Plaintiffs have suffered and continue to suffer emotional trauma as a result of Defendant's conduct.

12. In addition to monetary damages, Plaintiff seeks declaratory relief and immediate preliminary, temporary, and permanent injunctive relief prohibiting Defendants from continuing their patterns and/or practices of ratifying, condoning, and authorizing violent, racist, and unlawful threats and pronouncements directed against the Plaintiffs and others similarly situated. The failure to provide such relief will result in these unlawful practices continuing, thereby causing irreparable harm to Plaintiffs, for which no plain, adequate, or complete remedy at law is otherwise available.

### **JURISDICTION AND VENUE**

13. This action arises under the Fourteenth Amendment to the United States Constitution, the Civil Rights Act of 1871, 42 U.S.C. § 1983, 1985, 1986, Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. § 2000d, and the Constitution and laws of the State of Michigan.

14. Subject-matter jurisdiction to adjudicate the claims advanced in this action is conferred on this Court by 28 U.S.C. §§ 1331, 1343(3) and (4), 2201, and 1367.

15. Venue is proper in the United States District Court for the Eastern District of Michigan pursuant to 28 U.S.C. § 1391(b)(1) and (b)(2).

### **PARTIES**

16. In light of how specific and direct the threats upon the physical wellbeing and lives of African Americans have been at BHHS and the recent shooting at Oxford High School, Plaintiffs herein have requested that their names not be publicly displayed in this lawsuit. Plaintiff's true names will be confidentially provided to the Defendants.

17. Plaintiff, S.M., a minor, is a 15-year-old African American student at BHHS who resides in Oakland County, Michigan.

18. C.M. and D.M., African Americans, at all times material hereto were and are S.M.'s parents and legal guardians and reside in Oakland County,

Michigan.

19. Plaintiff, K.A., a minor, is a 16-year-old African American student at BHHS and resides in Oakland County, Michigan.

20. Plaintiff, N.A., an African American, at all times material hereto was and is K.A.'s parent and legal guardian and resides in Oakland County, Michigan.

21. Plaintiff, M.S., a minor, is a 14-year-old African American student at BHHS and resides in Oakland County, Michigan.

22. Plaintiff, S.C., an African American, at all times material hereto was and is M.S.'s parent and legal guardian and resides in Oakland County, Michigan.

23. Plaintiff, K.F., a minor, is a 16-year-old African American student at BHHS and resides in Oakland County, Michigan.

24. Plaintiff, C.F., an African American, at all times material hereto was and is K.F.'s parent and legal guardian and resides in Oakland County, Michigan.

25. Plaintiff, C.S., a minor, is a 15-year-old African American student at BHHS and resides in Oakland County, Michigan.

26. Plaintiff, S.S., an African American, at all times material hereto was and is C.S.'s parent and legal guardian and resides in Oakland County, Michigan.

27. Plaintiff, D.A., a minor, is a 15-year-old African American student at BHHS and resides in Oakland County, Michigan.

28. Plaintiff, E.A., an African American, at all times material hereto was



and is D.A.'s parent and legal guardian and resides in Oakland County, Michigan.

29. Plaintiff, R.H., a minor, is a 14-year-old African American student at BHHS and resides in Wayne County, Michigan.

30. Plaintiff, J.H., an African American, at all times material hereto was and is R.H.'s parent and legal guardian and resides in Wayne County, Michigan.

31. Defendant BHSD is an public school district authorized under the laws of the state of Michigan. BHSD operates Bloomfield Hills High School pursuant to state statute and regulations. At all relevant times herein, BHSC acted under color of law.

32. Defendant PATRICK WATSON (hereinafter "WATSON") was, at all relevant times, Superintendent of BHHS, employed by BHSD and acting under color of law. BHSD continues to employ WATSON.

33. Plaintiffs are suing WATSON in both his official and individual capacities.

34. Defendant WATSON is a citizen of Michigan domiciled in Wayne County.

35. Defendant CHARLIE HOLLERITH (hereinafter "HOLLERITH") was, at all relevant times, the Principal of BHHS and employed by BHSD and acting under color of law. BHSD continues to employ HOLLERITH.

36. Plaintiffs are suing HOLLERITH in both his individual and official

capacities.

37. Defendant HOLLERITH is a citizen of Michigan domiciled in Oakland County, Michigan.

**Plaintiffs Seek Preliminary and Permanent Injunctive Relief because Defendants' Actions Have Caused and Continue to Cause Harm**

38. Plaintiffs incorporates by reference the allegations set forth in the paragraphs above.

39. Of necessity, Plaintiffs, minors, will be forced to continue as students at Bloomfield Hills High School and, consequently, Plaintiffs and their parents realistically fear for their safety and even their lives. That racist harassment, threats, pronouncements, and actions will be repeated and continue absent injunctive relief to prohibit the practices, policies, and customs of the Defendants that have and continues to tolerate, encouraged, foster, condoned, and ratify the above described disruptive and unlawful discriminatory conduct.

40. Plaintiffs fear for their safety as a result of racist threats, pronouncements, actions, and ongoing threats of violence, fostered by Defendants, because it has continued repeated, notwithstanding Defendants' knowledge of same and without any and or adequate and meaningful intervention by Defendants to prevent it.

41. Injunctive relief sought includes such preliminary injunctive relief the

court deems just and effective.

### **FACTUAL BACKGROUND**

#### **Plaintiffs S.M., C.M. and D.M.**

42. Plaintiff, S.M., is a fifteen (15) year-old African American student at BHHS.

43. On or about June of 2020, Plaintiff S.M., enrolled in BHHS.

44. Soon after her enrollment, S.M. encountered a pervasive culture of racial discrimination tolerated and acquiesced to by BHHS's staff, teachers and principals. S.M. was also repeatedly shunned and ostracized by her BHHS athletic coaches on the basis of race.

45. On or about October of 2021, a Black doll with red lips was hung by a noose over the second-floor banister of the main hallway of the school, in clear view of students and staff (**See Appendix 1**).

46. Defendants WATSON and HOLLERITH knew and or should have known of this incident. They refused and/or failed to take any action against the persons responsible for this racially demeaning effigy.

47. Various BHHS students created a video of this event and circulated the video both on social media and directly to S.M. and other African-American students.

48. S.M. reported this incident to her guidance counselor and explained



that the incident greatly frightened and disturbed her. S.M.'s counselor dismissed these concerns.

49. Defendants WATSON and HOLLERITH knew and or should have known of the above described incidents and refused or failed to investigate and or adequately investigate this incident and take any action against the perpetrators.

50. On or about November of 2021, a White female student in Plaintiff's class said the word "nigga" in the presence of the entire class. Plaintiff reported this to the teacher of the class. That racially offensive act was dismissed as "only dark humor" and no known action was taken against the White student that used the racial slur.

51. Defendants WATSON and HOLLERITH knew and or should have known about this incident but no known action was taken against the student that made the racial slur.

52. On or about November 10, 2021, Plaintiff S.M., entered the women's restroom at BHHS. She saw graffiti on the bathroom wall stating, "Kill all Niggers!!" Plaintiff, S.M. took a photograph (see Appendix). Defendants knew or should have known of the incident but upon information did not take action and or inadequately addressed the incident (**See Appendix 2**).

53. On another occasion, another racially intimidating threat on Plaintiff, S.M.'s life was seen by Plaintiff as inscribed in on the women's' restroom wall

“All Niggers should be dead!” (See Appendix 3).

54. In a context of pervasive racial discrimination at BHHS and violence against people of color nationally, Plaintiff reasonably understood the graffiti to threaten violence against her and other African American students at BHHS.

55. As a reaction to these and other threats, Plaintiff suffered repeated sleeplessness, nightmares of being chased by White people, a skin rash associated with anxiety, loss of appetite, and a negative impact on the quality of her schoolwork.

56. Defendants WATSON and HOLLERITH knew and or should have known of the above-described incidents but refused or otherwise failed to investigate, adequately investigate and or take action and or adequate action against the persons responsible.

57. Plaintiff regularly hears White students in the hallway use the word “nigger” and “nigga.” She has reported this to her guidance counselor, and Defendants WATSON and HOLLERITH knew or should have known of this practice, but still has not taken action and or adequate action to stop the use of these racial epithets at BHHS.

58. Social media posts circulated during the relevant time period among BHHS students is replete with expressions of racial hatred and threats to carry out acts of physical violence against African-American students and parents. (For one

example of such posts, see the Appendix to this Complaint). BHHS students have accessed these posts and discussed them while on school property. Upon information and belief, some of these posts are uploaded by White BHHS students while on school property **(See Appendix 4)**.

59. Defendants WATSON and HOLLERITH knew and or should have known of these posts and their connection to BHHS but did not take action and or adequate action to investigate and or adequately investigate them or use Internet filters to prevent the use of school property to launch or view them, nor did they admonish the student body against such behavior.

60. On or about November 18, 2021, Defendant's BHHS, reported another incident involving yet more racist graffiti on the toilet paper dispenser of the middle stall of the second-floor girl's restroom. This graffiti stated: "Don't F\*\* (illegible) N\*\*\*." (See the Appendix to this Complaint). Defendants, WATSON and HOLLERITH knew and or should have known that BHHS was being used in this manner but failed to take action and or adequate action and or investigate or adequately investigate.

61. Because of the behavior described herein above, Plaintiffs have an ongoing fear for their safety and, indeed, loss of their lives.

Plaintiffs D.A. and E.A.

62. Plaintiff, D.A., is a fifteen (15) year-old African American student at



BHHS.

63. On or about June of 2020, Plaintiff, D.A. enrolled at BHHS.

64. After enrolling, Plaintiff, D.A., encountered a pervasive culture of racial discrimination encouraged and or tolerated by BHHS's staff, teachers, principals and its superintendent.

65. During her freshman year, Plaintiff, D.A. was sitting in the main Court at BHHS with a few of her African American friends when a White BHHS female student, G.W., sitting at a table nearby looked at Plaintiff, DA, and her African American friends and said "You're all niggers" loud enough for Plaintiff and her African American friends to hear.

66. When Plaintiff, D.A. attempted to politely explain to the White BHHS female student why using the word "Nigger" was offensive, the White female student again yelled the word "Nigger!" in D.A.'s face.

67. Plaintiff D.A. and the other African American students who witnessed same informed a janitor of this incident. The Janitor directed D.A. and her African American classmates to report the incident to the principal. The incident was reported to the principal as directed and the principal failed to take action and or adequate action to address the incident.

68. On or about November 3, 2021, Plaintiff, D.A., and her African American classmates were studying in the "Knowledge Market" at BHHS. The

Knowledge Market is a regularly used study area for BHHS students. While studying, a White BHHS hall monitor approached Plaintiff and requested that she and her African American classmates leave the study area.

69. D.A.'s White similarly situated classmates were also studying in the market area but were not requested to leave.

70. At the time the hall monitor forced D.A. and her African American classmates to leave the study area but allowed the White students to remain, Assistant Principal Lupone and Principal Hollerith were present and heard the exchange but did not take action against the hall monitor or in any way attempt to address the above described discriminatory treatment of DA and her African American classmates.

71. On or about November of 2021, D.A.'s African American classmates sent screenshots of racially discriminatory social media posts to D.A.'s phone. Said social media posts were uploaded to snapchat and other social media platforms by White BHHS students. The social media messages posted by White BHHS students included but were not limited to use of the word "nigger" and or referring to Black people as "niggers", along with other racially derogatory language. This was and is an accepted custom at BHHS (**See Appendix 4**).

72. Principals Hollerith and Lupone were aware of the spreading of these racially offensive messages at BHHS and upon information and belief did nothing

to address and or did nothing to adequately address the matter.

73. On or about November of 2021, Plaintiff, D.A. received, on her cell phone, a picture of the writing “Kill all Niggers!!!” that was written on the wall of the second-floor girl’s restroom at BHHS (**See Appendix 2**).

74. Faculty and staff including but not limited to the principals at BHHS had knowledge of the above-described threat. The faculty staff and principals failed to take adequate measures to address the matter. BHHS does not maintain a safe learning environment for Plaintiff, D.A and other students of color.

75. On or about November of 2021, Plaintiff, D.A. saw on Snapchat, a video of a Black doll being hung from the second floor down into the commons area at BHHS by White students. Said video was recorded by DA’s African American classmate who later posted it to snapchat in an attempt to expose and criticize the racial effigy incident.

76. This racially discriminatory effigy incident created fear in Plaintiff, D.A. and her mother Plaintiff, E.A. for reasons that such open display of racial hatred, insensitivity and inappropriate and threatening conduct was boldly displayed in the presence of all to see.

77. On or about November of 2021, Plaintiff, D.A. was exposed to racially discriminatory social media messages and posts that were made by her White BHHS classmates, some of the messages included “3 Ks a day, keeps the



Niggers away” accompanied with a picture of the Ku Klux Klan, a screenshot of a writing on BHHS’ wall that reads “All the Niggers should be dead!!” and a picture of the Black doll that was hung from BHHS’s second floor down into the first floor common area **(See Appendix 5).**

78. On or about November of 2021, Plaintiff received a screenshot of a message from one of her African American classmates that depicted a threat that was written in the girls’ bathroom wall on the second floor that read, “KILL ALL NIGGERS!!!” **(See Appendix 2).**

79. The threat was so serious that some of the teachers had a meeting with the Superintendent at BHHS to suggest moving to an online and or virtual learning format.

80. On or about November 11, 2021, Plaintiff D.A.’s teachers shared with a class in which Plaintiff, D.A. was present that the Superintendent had declined the idea of moving to a virtual learning format for the students going forward notwithstanding the threats of physical harm and death of African American students.

81. November 11, 2021 was Plaintiff D.A.’s last day going into school in person that week because of Plaintiff, E.A.’s fear for her daughter’s life.

82. On or about November 16, 2021, BHHS held a “Community Meeting” to address the racially discriminatory misconduct going on at BHHS.

While in attendance, Plaintiff, E.A. heard the Superintendent attempt to justify the Black doll hanging as a “science project.” He specifically stated, “In the defense of the doll hanging, there was a gravity project going on that day.” The same constitutes an executive decision maker adopting and tolerating a custom and practice of racially discriminatory conduct by BHHS’s staff teachers.

83. The Superintendent did not speak to the inappropriateness or otherwise wrongfulness of the doll hanging or provide any solutions to curb the racially discriminatory conduct going forward at BHHS.

84. At the meeting, the Superintendent directed all of the parents and students in attendance to put their phones up and not to record the meeting.

85. This meeting did not leave Plaintiffs E.A. and D.A. feeling safe or comfortable within the BHHS environment.

86. On or about November of 2021, Plaintiff, DA received another threat via social media that other BHHS African American students had also received at around Seven in the morning that read “I am coming to give all the niggers what they deserve will all be my my slaves” and was accompanied by a gun emoji (**See Appendix 6**).

87. On the same morning Plaintiff, D.A., received said threat, Plaintiff, E.A. called BHHS to inquire whether BHHS would be open that day because of the gun threat. The school responded by telling Plaintiff, E.A. that she did not

know about the threat and asked Plaintiff to email to receptionists a copy of the threat. Plaintiff, E.A. emailed a copy of the threat to the BHHS.

88. Approximately ten (10) minutes after emailing the receptionist a copy of the threat, Plaintiff, E.A. received a call from Bloomfield Township Police Department who then asked Plaintiff to email a copy of the threat to them.

89. A few moments after Plaintiff, E.A. emailed a copy of the threat to the Bloomfield Township Police Department, the Police Department called Plaintiff, E.A. back and told her, in the future not to direct any of the social media posts or threats that she sees or hears to Bloomfield Hills High School but instead to direct them to the Police Department because BHHS was not relaying any of threats or posts back to the police department nor were they taking them serious. BHHS's conduct is a clear demonstration of its deliberate indifference to the racially discriminatory school environment that is harbors.

90. As a result of the above-described threats of violence and death and Defendant's failure to take action and or adequate action to create a safe learning environment at BHHS, Plaintiff, D.A. has experienced sleeplessness, intensified nightmares, specifically nightmares that someone used a gun to shoot up BHHS.

91. Further Plaintiff, D.A. has suffered from severe anxiety, finds herself crying often and has been scared to gout in the world for fears for her safety.

Plaintiff C.S. and S.S.

92. Plaintiff, C.S. is a fifteen (15) year-old African American student at BHHS.

93. On or about June of 2020 Plaintiff, C.S enrolled in BHHS.

94. During her freshman year (20'-21' school year), on or about November of 2020, Plaintiff, C.S. and other African American students were exposed to numerous racist messages typed by a White female BHHS student posted on social media. The White female student is named G.W. (who has a documented history of saying Nigger at BHHS both to and amongst BHHS African American students). G.W. sent numerous Instagram messages to African American male BHHS students, calling the African American male students "Nigger" in the messages.

95. The screenshot messages were reported to the school's principals who failed to take action and or adequate action against G.W. Upon information and belief, G.W. was not suspended, expelled or punished in any way for this conduct.

96. The African American male students in receipt of these racially offensive and discriminatory messages, in an effort to protest and expose same, screenshot these messages from G.W. and posted them on Instagram.

97. Plaintiff, C.S. not only saw the screenshots of these messages on Instagram but the screenshots of the racially offensive messages circulated in group chats that she shared with her African American friends at BHHS where



they shared their disgust, embarrassment, and feeling of a lack of protection from BHHS faculty and staff against racially discriminatory conduct by White students.

98. The lack of action and or adequate action taken by BHHS's faculty, staff, teachers and principals to address G.W.'s conduct, discouraged Plaintiff from reporting future incidents as she felt such reports would be futile. For example, C.S. personally found and took a picture of the word "Nigga" written on the thermostat in BHHS's photography room (**See Appendix 7**).

99. On or about October of 2021, during Plaintiff, C.S.'s sophomore year, while Plaintiff, C.S. was in chemistry class at BHHS, Plaintiff went to the restroom and upon returning to her chemistry class, a White male BHHS student in that same chemistry class, named B.E., voluntarily said aloud to Plaintiff, C.S., "Fetti called you a monkey."

100. Fetti, who was also a White BHHS male student and present with B.E. at the time B.E. made the statement, denied making said racially offensive statement. Fetti and B.E. continued to go back and forth arguing aloud where Plaintiff, C.S. could hear, as to who called Plaintiff a "monkey."

101. This offended Plaintiff, C.S. made her feel uncomfortable and distracted her from her schoolwork.

102. On or about October of 2021, a White female student at BHSS, A.F. sent a racist message to Plaintiff's African American classmate calling him a

“nigger” (See Appendix 8).

103. Not only did Plaintiff, see this message firsthand when her friend showed her the message from A.F., but the message was screenshot and posted on Instagram where other African American BHHS students could see it. The Superintendent and or the Principal knew or should’ve known about this incident but failed to take action and or adequate action to address the incident.

104. On or about November of 2021, graffiti was found written on the wall of a stall inside the girls’ second floor restroom at BHHS, which read, “KILL ALL NIGGERS!!” (See Appendix 2).

105. Plaintiff, C.S., did not see this writing in person, but it, like many other racially charged discriminatory messages and posts were passed around to Plaintiff, C.S. and other BHHS African American students on Snapchat.

106. This threat made Plaintiff fearful to be physically present at BHHS, because she was an African American.

107. The principals were aware of the threat to “Kill all Niggers!!” and decided the proper recourse was to close down the second-floor girl’s restroom where the graffiti was found. This did not make Plaintiff, C.S. feel any safer.

108. One of Plaintiff, C.S.’s White teachers, reread the “Kill all Niggers!!” threat aloud in class, saying “Niggers” aloud so that all of the African American students could hear her, this added insult to injury as same made Plaintiff and other

African American students uncomfortable.

109. On or around November of 2021, racially offensive threats and social media posts created by White BHHS students began getting screenshot and passed around to BHHS students via text messages and Snapchat. These messages and threats included but are not limited to a meme that read “3 Ks a day will keep the Niggers away” which was accompanied by a picture of the Ku Klux Klan (Posted by White male N.W.) and a picture of a graffiti writing on a BHHS wall that read “All the Niggers should be dead!!” **(See Appendix 4)**

110. BHHS’s principal and the District’s Superintendent were made aware of said threats and social media posts but failed to take adequate action to address these matters.

111. On or about November of 2021, Plaintiff, C.S. saw what appeared to be a White adult male standing on the second floor of BHHS holding a string with Black doll hanging on the end of the string. The doll appeared to have on a purple dress and wearing red lipstick. The doll was hanging from the string in the common area in clear view of BHHS students. The White male adult holding the string that the Black doll was hanging from was surrounded by White BHHS students.

112. Plaintiff, C.S. could not believe that she had seen what appeared to be a White male teacher hanging a Black doll from the second floor at BHHS. It was

later substantiated by a video posted on social media.

113. Seeing this racist effigy, made Plaintiff, C.S. uncomfortable, fearful and feeling unsafe at BHHS as the incident reminded her of the lynching of African Americans that occurred regularly in the Jim Crow South.

114. The incident of the Black doll hanging in BHHS from the second balcony was reported to various faculty including principals, Jessica Lupone, Cathy McDonald, and David Reed-Nordwall. The incident was later justified as having been a “science project.” The principal’s attitude toward this matter reflected a deliberate indifference about the racially discriminatory, offensive and threatening environment that prevails at BHHS.

115. After the Black doll hanging incident occurred, on or about November of 2021, BHHS students came together to protest the racial misconduct occurring at BHHS by holding a walkout during the middle of school hours.

116. The same week the walkout was to occur, more racist messages and posts surfaced on social media as messages were going around on Snapchat and being screenshot and shared amongst the BHHS staff and faculty.

117. Specifically, the racist messages contained things such as, including but not limited to, a screenshot of the writing on the wall of the girl’s second floor restroom at BHHS that stated “KILL ALL NIGGERS!!” and contained a picture of the Black doll that was hung from the second floor of BHHS’s balcony down into



the first-floor common area. Upon receiving these images, Plaintiff, C.S. immediately shared them with her mother, Plaintiff, S.S (See Appendix 5).

118. Although Plaintiff, C.S. did not witness every racial post or incident in person, this along with the other racists activity going on at BHHS coupled with BHHS's faculty and staff's failure to act and or take adequate action to address the racially charged and offensive comments and threats made her fearful of attending school in person at BHHS.

119. The week the walkout was planned to take place, Plaintiff, C.S. received messages on Snapchat warning that the walkout would be "shot up." This was reported to BHHS faculty, yet, the walkout and classes proceeded as scheduled. This is yet another demonstration of Defendant's deliberate indifference to the violations of Plaintiff's Constitutional rights and health and safety.

120. The students at BHHS courageously held the walkout, where G.W. a White female, walked through the protest and screamed out "Nigger!" where students and faculty who were in attendance at the walkout could hear.

121. G.W. was not punished nor reprimanded for her conduct, even though the principal and superintendent were aware of her conduct.

122. On or about the week of Thanksgiving and before break a racially charged threat of violence was posted, a threat in which BHHS faculty and staff were aware of and did not adequately address.

123. The Snapchat threat read, “I am coming to give all the niggers what they deserve will all be my my slaves again” and was accompanied by a gun emoji  
**(See Appendix 6)**

124. This terrified and offended Plaintiff, C.S. and the other African American students at BHHS and made them uncomfortable and this was evidenced by African American parents pulling their kids out of school on the same day the threat was communicated.

125. This overall experience at BHHS has negatively impacted Plaintiff C.S., as she has seen a decrease in her grades because it has been hard for her to focus and she has not been feeling like herself nor has she felt like doing her school work.

126. Further, Plaintiff, C.S. has shown signs of depression to Plaintiff, S.S. and has expressed that she does not feel safe at BHHS.

Plaintiff R.H. and J.H.

127. Plaintiff, R.H. is a fourteen (14) year old African American student at BHHS.

128. On or about June of 2021, Plaintiff, R.H. enrolled at BHHS.

129. On or about November of 2021, Plaintiff, R.H. received a message from a BHHS classmate via Snapchat that depicted a threat in graffiti that was written on the wall of a stall in the second-floor girl’s restroom of BHHS that read

“Kill all Niggers !!!” (See Appendix 2).

130. BHHS faculty and staff including principals Hollerith and Lupone were made aware of said threat, and to address the threat, they simply shut down the second-floor girls’ restroom where the threat was discovered. Said action by Defendants did not make Plaintiff, J.H., (Plaintiff R.H.’s Mother) feel that her child, Plaintiff, R.H would be any safer at BHHS.

131. On or about November of 2021, Plaintiff, R.H. saw on Snapchat, a video of a Black doll, hanging from the second-floor balcony of BHHS down into the first-floor common area of BHHS. Plaintiff, R.H showed this to his mother, Plaintiff, J.H who was highly offended (See Appendix 1).

132. On or about November 11, 2021, Plaintiff, R.H. received a collage from one of his African American classmates which consisted of pictures of the racially discriminatory conduct occurring at BHHS and racially discriminatory messages and posts made by White BHHS students that had been screenshot and sent around amongst BHHS students (See Appendix 5).

133. Some of these messages read things like the following and were included but not limited to: “3 Ks a day will keep the Niggers away” and was accompanied by a picture of some Ku Klux Klan members; a picture of the Black doll that was hung from the second-floor balcony at BHHS; and a picture of the graffiti found on the second floor of the girl’s restroom at BHHS that read “Kill All

Niggers!!!”

134. On or about November of 2021, students at BHHS held a walkout to protest the racially discriminatory conduct that plagued BHHS.

135. At the walkout, Plaintiff, J.H. entered the school at around eight o'clock a.m. to ensure her child's and other's safety at the walkout.

136. During the walkout, Plaintiff, J.H. saw Superintendent WATSON and who approached Plaintiff, J.H. and introduced himself, and Plaintiff, J.H. in turn asked the Superintendent what he was going to do about the racial misconduct occurring at BHHS.

137. The superintendent did not reply with a solution but instead mentioned how he was aware of the racially discriminatory posts that were circulating amongst BHHS students and that it was shameful that this such racially discriminatory misconduct is still occurring in the schools and that this was the type of conduct that occurred in the nineteen-fifties.

138. This response was concerning to Plaintiff, J.H. because the Superintendent provided no roadmap to cure the racists environment at BHHS or to help make the students safer, but instead was a disregard and justification for the racist misconduct that was going on at BHHS drawing a parallel to what happened in the 50's and 60's.

139. Superintendent WATSON also stated during this conversation that he



was surprised that the racial threat was written in the girls' restroom and not the boys' restroom, which came off to Plaintiff, J.H. like Superintendent WATSON was taking the threats lightly.

140. Plaintiff, J.H. while at the walkout also witnessed a White female BHHS student walk through the walkout and yell the word "Nigger!"

141. Plaintiff R.H. does not recall the White female student being punished in any way but instead was allowed to come to school the next day.

142. On or about November 15, 2021, Plaintiff, J.H. again reached out to the Superintendent via email following up to see if BHHS had come up with a plan to curb the racial discrimination and make the children safer at BHHS. Instead of providing a response to Plaintiff J.H.'s question in via email, the Superintendent WATSON asked for Plaintiff J.H.'s best contact number. After receiving a Plaintiff, J.H.'s phone number, the Superintendent Watson called Plaintiff the same day.

143. During the call with superintendent WATSON, plaintiff, J.H. again over the phone asked superintendent WATSON how he would handle the racial discrimination at BHHS and make the children safer, to which he responded with a deflection by saying that these types of incidents occurred in the nineteen-fifties and that the Bloomfield Hills Police Department were involved in an investigation to find out who was responsible for the racially discriminatory misconduct at

BHHS.

144. On or about November 16, 2021, Plaintiff, J.H. learned that another racially discriminatory message had been again posted in the girl's restroom at BHHS, this time the word "Nigger" was written on the toilet paper dispenser, another posting which Plaintiff R.H. received via Snapchat. As these posts and threats began to pile up, Plaintiff R.H. began to grow more and more worried about the safety of child, Plaintiff, R.H.

145. The faculty and staff at BHHS were all made aware of all of the racially discriminatory conduct that was occurring at BHHS and failed to take adequate measures to prevent such misconduct from further occurring and or making the BHHS students feel safe.

146. BHHS did however held a "community meeting" on or about November 16, 2021, to address the racially discriminatory misconduct at BHHS in which Plaintiff, J.H. was in attendance.

147. At this community meeting, Plaintiff, J.H. again saw Superintendent WATSON, who she addressed by again asking him, how he was going to handle the racism going on at BHHS?

148. Superintendent WATSON then responded to her again by saying that the racially discriminatory occurrences that were going on at BHHS were something that only occurred in the nineteen-fifties. Superintendent WATSON

told Plaintiff, that he had received emails from White BHHS student's parents asking him "What are we going to do about these people?" and he mentioned how comfortable those parents had to be to send him an email like that. Superintendent WATSON did not provide any information as to how he would deal with the racist attitudes of the White parents who communicated such to him.

149. Plaintiff, J.H. told Superintendent WATSON that the students responsible for the racially discriminatory misconduct at BHHS should be held liable. Superintendent WASTSON had no response for Plaintiff as she continued to lose confidence in BHHS and their ability to protect her child.

150. On or about November of 2021, the week of Thanksgiving, another threat directed at BHHS's African American students spread on social media amongst BHHS students. Plaintiff R.H. received this threat via Snapchat, in the morning and said threat read, "I am coming to give all the niggers what they deserve will all be my my slaves" and was accompanied by a gun emoji (**See Appendix 6**).

151. BHHS faculty, and staff although fully aware, failed to take adequate steps to protect and or make the children and more specially Plaintiff, R.H. safe as school remained open the day the threat was sent out and the next two following days.

152. Plaintiff is fearful to take her son to school, is not confident that the

police are adequately investigating the threats or protecting BHHS and has been depressed causing her to experience sleeplessness.

153. Plaintiff, RH, was fearful about returning to school, and stayed up late in his mother's room on the night the threat was spread. Plaintiff RH mentioned how he can no longer focus at school because always has to watch the door and window while at BHHS to make sure he is sitting in a position where can see all entrances.

M.S. & S.C.

154. Plaintiff, M.S. is a fourteen (14) year-old African American student at BHHS.

155. On or about June of 2021, Plaintiff, M.S. enrolled in BHHS.

156. On or about October of 2021, Plaintiff, M.S. began to see on Snapchat and Instagram racially discriminatory, threatening, and offensive posts and messages that were made, typed and or sent by her White BHHS classmates. These messages and posts depicted instances where White BHHS students were using the word "Nigger."

157. On or about October of 2021, Plaintiff, M.S. received from one of her BHHS African American classmates a video of a Black doll hanging from the second-floor balcony of BHHS down into the first-floor common area (**See Appendix 1**).



158. In the video, Plaintiff, M.S. observed what she believed to be White students surrounding the Black doll's hanging point.

159. This made Plaintiff, M.S. fearful for her safety because she is aware of the history of White people hanging African Americans in this country and she reported this to her mother, Plaintiff, S.C. who was equally outraged and as fearful as Plaintiff, M.S.

160. On or about November of 2021, students at BHHS planned a walkout to protest the racial discrimination that was occurring at BHHS.

161. On or around November of 2021, Plaintiff, M.S. received a text message from one of her African American classmates which depicted a threat in the form of a writing in graffiti on the wall in a stall of the girls' restroom on the second floor at BHHS that read "Kill All Niggers!!!" Plaintiff, M.S. shared this with her mother, Plaintiff, S.C. Principals Hollerith and Lupone were well aware of the existence of said threat against BHHS' African American students yet failed to take adequate action to protect BHHS students from these racially motivated threats of physical harm and death **(See Appendix 2)**.

162. To address this threat, BHHS faculty and staff temporarily closed the girls' bathroom where the "Kill all Niggers!" threat was discovered, but upon information and belief did nothing more to prevent such threats in the future.

163. On or about November of 2021, Plaintiff, M.S. received a collage

consisting of the pictures taken of racially discriminatory posts and writings in BHHS and on social media in an effort to spread awareness.(See Appendix)

164. The pictures included but were not limited to “3 Ks a day, keeps the Niggers away” accompanied with a picture of the Ku Klux Klan, a screenshot of a writing on BHHS’ wall that reads “Kill All Niggers!!” and a picture of the Black doll that was hung from the second floor of BHHS’ balcony down into the first-floor common area **(See Appendix 5).**

165. On or around November 2021, Plaintiff, M.S. received a text message of a screenshot of a Snapchat threat that had been sent to BHHS students that read, “I am coming to give all niggers what they deserve will all be my my slaves.” This post was accompanied by a gun emoji **(See Appendix 6).**

166. On the same day that Plaintiff, M.S. received the threat accompanied by the gun emoji she heard rumors that BHHS would be “shot up”. This intensified M.S.’s fear of being at BHHS. Defendants Hollerith and Watson knew or should have known of these threats and upon information and belief failed to take action or adequate action to address these threats and secure the students’ safety **(See Appendix 9).**

167. On or about November of 2021, after receiving information about the above-described threat, Plaintiff M.S.’ Mother, Plaintiff S.C., called BHHS and asked to speak with the Principal, Defendant Hollerith about the threat that BHHS

would be shot up. S.C. was told that Defendant Hollerith was not available. S.C. requested that Hollerith return her call, however, Defendant Hollerith never responded to S.C.'s request to communicate with her about said threat and her daughter's safety at BHHS.

168. Due to the above described racially discriminatory, offensive and hostile environment that has been tolerated by Defendants, Plaintiff M.S. has experienced difficulty in focusing on her schoolwork, daydreams about BHHS being shot up, and continues to suffer from severe anxiety.

169. As a result of the above described incidents and Defendants' Hollerith and Watson's failure to take action and or adequate action to abate the racially discriminatory BHHS school environment, Plaintiff S.C. is fearful that her daughter, Plaintiff M.S. has lost her motivation to attend school and learn.

K.F. and C.F.

170. Plaintiff, K.F. is a sixteen (16) year old African American student at BHHS.

171. Plaintiff, K.F. has been enrolled in the Bloomfield Hills School District since she was in Middle School.

172. While at Bloomfield Hills Middle School, Plaintiff, K.F. received her first exposure to racism when one of her White classmates repeatedly called her a "chimpanzee" and told her that "all Black kids have big noses."

173. Said incidents were reported by Plaintiff, K.F., to her father, Plaintiff, C.F., and to her counselor at Bloomfield Hills Middle School, Mr. Fisk, however the students responsible for using the racially discriminatory language toward Plaintiff, K.A. were never disciplined. The lack of addressing said discrimination made Plaintiff K.F. begin to believe that such misconduct by White students is acceptable, normal, and that reporting such racial misconduct to Bloomfield Hills School District faculty and staff would be futile.

174. On or about May of 2019, Plaintiff, K.F. enrolled at BHHS.

175. Since her freshman year at BHHS in 2019, K.F. has heard White students at BHHS openly use and call Black students the word “Nigger” as some of the White students would sing songs, greet and address K.F. and her African American classmates using the word “Nigger”, which Plaintiff, K.F. found extremely offensive. Defendants Watson and Hollerith knew and or should have known that this racially discriminatory custom and practice had permeated BHHS yet they failed to take action and or adequate action to stop said conduct by White students.

176. On or about September of 2019, K.F. began seeing social media messages and posts in which her White classmates and other White students at BHHS would use the word “Nigger” or make otherwise offensive and racially discriminatory comments towards African Americans. Defendants Watson and



Hollerith knew and or should have known that this racially discriminatory custom and practice had permeated BHHS yet they failed to take action and or adequate action to stop said conduct by White students.

177. On several different occasions during Plaintiff, K.F.'s freshman year when she and a few of her African American friends were walking down the halls of BHHS, a group of White male BHHS students would walk behind Plaintiff, K.F. and her African American friends, making monkey sounds. When Plaintiff, K.F. and her friends turned around to address the White male students, they all started laughing. K.F. and her friend knew that the White males had been making the monkey sounds because no one else was around at the time. Defendants Watson and Hollerith knew and or should have known that this racially discriminatory custom and practice had permeated BHHS yet they failed to take action and or adequate action to stop said conduct by White students.

178. A particular White student, named G.W., repeatedly used the word "Nigger" or "Nigga" toward and in the presence of Plaintiff, K.F. and other African American students and had a reputation amongst the African American students at BHHS for using the word. K.F. was extremely offended by this conduct and found that it interfered with her ability to focus on her schoolwork.

179. Since K.F.'s freshman year at BHHS, African American students have complained to both principals Lupone and Principal Hollerith about G.W., a White

female student at BHHS, yet G.W. was never suspended or otherwise disciplined for her using the word “Nigger.” Defendants Watson and Hollerith knew and or should have known that this racially discriminatory custom and practice had permeated BHHS yet they failed to take action and or adequate action to stop said conduct by White students.

180. Plaintiff K.F. specifically remembers on or around October of 2020 an occasion in which one of her White classmates said the word “Nigger” in earshot of Plaintiff, K.F. and other African American students. When her African American male friend reported the White student’s use of the word “Nigger” to the teacher (who was White), Plaintiff, K.F. heard the teacher respond by saying, “if the White students can’t use the n-word then the Black students can’t use the n-word either.” Defendants Watson and Hollerith knew and or should have known that this racially discriminatory custom and practice had permeated BHHS yet they failed to take action and or adequate action to stop said conduct by White students.

181. Plaintiff K.F. told her father, Plaintiff, C.F. about this incident who was outraged and in disbelief that a BHHS teacher would say such a thing. Further this made Plaintiff, K.F., feel unprotected by the Defendants Watson and Hollerith at BHHS.

182. On or around October of 2021, Plaintiff, K.F. began to see racially threatening and offensive social media posts and messages that were made, typed

and or sent by White BHHS students. These messages and posts depicted videos of White BHHS students using the word “Nigger” and posting other racially discriminatory messages and memes including a writing on the wall of a BHHS female restroom that read “All Niggers should be dead!!” (**See Appendix 4**).

183. Faculty and staff including but not limited to the Principals at BHHS were made aware of these racially discriminatory offensive threats, posts, and messages, yet they failed to take adequate action to curb such conduct.

184. On or about October of 2021, while Plaintiff K.F. was walking down the hallway with one of her African American female classmates, Plaintiff K.F. and her friend saw a Black doll hanging down from the second-floor balcony of BHHS into the commons area. Plaintiff K.F. and her friend could both clearly see that it was a Black doll and that it had on a purple dress and red lipstick. Plaintiff, K.F., was shocked, outraged, and at the same time became fearful of her physical wellbeing and for her life. Plaintiff, K.F., is aware of the history of our country hanging Black people to their death. Defendants Watson and Hollerith knew and or should have known that this racially discriminatory custom and practice had permeated BHHS yet they failed to take action and or adequate action to stop said conduct by White students, staff, and teachers (**See Appendix 1**)

185. Plaintiff K.F. also viewed her classmates video recording the Black doll hanging into the first-floor commons area of BHHS with their cell phones.



186. The Black doll hanging in BHHS along with the writing of graffiti and other racially discriminatory charged threats and social media posts made by White BHHS students made Plaintiffs C.F. and K.F. fear for Plaintiff, K.F.'s safety because they did not know how far BHHS and Defendants Hollerith and Watson would allow this discriminatory misconduct to go based on previous inaction and or inadequate action taken to abate similar previous racially unlawful discriminatory conduct.

187. The Black doll hanging from the second floor of BHHS was later justified to Plaintiff, K.F. as a "science project" by the Superintendent at a community meeting. Defendant Watson's public pronouncement that the racially discriminatory and offensive effigy (hanging of a Black doll from the second floor) constitutes a policy making official knowing about and acquiescing to such practices. Thereby clearly communicating the toleration of racially discriminatory and offensive customs that leads and has led to the deprivation of constitutionally protected rights of African American students and their parents at BHHS. *Powers v. Hamilton Cty. Pub. Def. Comm'n*, 501 F.3d 592, 607 (6<sup>th</sup> Cir. 2007)(*Memphis, Tenn. Area Local, Am. Postal Workers Union v. City of Memphis*, 361 F. 3d 898, 902 (6<sup>th</sup> Cir. 2004))

188. On or about November of 2021, Plaintiff, K.F. received a text message from one of her African American classmates which depicted a threat in



the form of a writing in graffiti on the wall in a stall of the girls' restroom on the second floor in BHHS that read "Kill All Niggers!!!" (**See Appendix 2**)

189. Plaintiff, K.F. showed this text message to her father C.F. and they both took the threat seriously and became concerned about the dangers of continuing to attend BHHS. Principals Hollerith and Lupone were well aware of the existence of said threat against BHHS' African American students yet failed to take adequate action to protect BHHS students.

190. To address this threat, BHHS faculty and staff temporarily closed the girls' bathroom where the "Kill all Niggers!" threat was discovered, but upon information and belief did nothing more to address the incident, Plaintiffs K.F. and C.F. found this to be inadequate.

191. On or about November 16, 2021, BHHS held the Community meeting where they were supposed to address the racially discriminatory misconduct going on at BHHS. While in attendance, Plaintiff, KF was approached by a White student's, mother (whose son made a Snapchat post that said "all niggers should be extinct") who was yelling and attempting to justify her son's conduct.

192. The superintendent who was present at the meeting did nothing to stop the woman but allowed her attempt to justify her son posting a social media message that said "All niggers should be extinct", as if he believed the conduct could be justified. Defendants Watson and Hollerith knew and or should have

known that this racially discriminatory custom and practice had permeated BHHS yet they failed to take action and or adequate action to stop said conduct by White students.

193. BHHS teachers began to discuss racial issues in class and asked students how the racially discriminatory incidents occurring at BHHS made them feel. Such an approach to addressing such a serious matter was not productive, reckless, and demonstrates a deliberate indifference to the racially discriminatory environment prevailing at BHHS. This approach is also evidenced that the school district has not properly trained its teachers and staff on what constitutes unlawful discrimination.

194. On or about November of 2021, Plaintiff, K.F. received a collage consisting of the pictures of screenshots of the racially discriminatory posts and writings in BHHS and on social media in an effort to spread awareness (**See Appendix 5**).

195. On or around November 2021, Plaintiff, K.F. received a text message of a screenshot of a Snapchat threat that read, "I am coming to give all niggers what they deserve will all be my my slaves." This post included a gun emoji. Plaintiff K.F. received the picture of this posting during school hours and she immediately texted Plaintiff, C.F. that she did not want to be at school any longer because she was afraid (**See Appendix 6**).

196. Plaintiff C.F. pulled Plaintiff K.F. out of school after their own investigation led them to believe that BHHS, in light of their awareness of the threat of a potential school shooting, had taken inadequate measures to secure Plaintiff K.F.'s safety.

197. The above described incidents and conduct by BHHS' White students, teachers, staff, principals, and Superintendent has negatively affected Plaintiffs KF and MC in ways that they are not as comfortable or confident about their safety at BHHS as they were before. The quality of Plaintiff's school work has suffered, Plaintiffs suffer from severe anxiety, and at times dream about bad things happening to them at BHHS.

K.A. and N.A.

198. Plaintiff, K.A. is a sixteen (16) year old African American student at BHHS.

199. Plaintiff, K.A. has been in the Bloomfield Hills School District since she was in middle school, which is where she began to experience racial discrimination within the BHSD.

200. When Plaintiff K.A. was in the seventh grade at Bloomfield Hills Middle School, Plaintiff was repeatedly called a "Monkey" by a White male student in her class named C.

201. Plaintiff, K.A. reported this to her mother, Plaintiff, N.A., and to her

counselor at the time, Mr. Fisk, who did not take adequate action to abate the problem. The White male student continued to call Plaintiff, K.A., a monkey because no adequate action was taken to deter his use of the racially derogatory language.

202. Since Plaintiff, K.A. began attending BHHS in or around August 2019, she hears the word nigger used regularly by White students at BHHS in the hallways, classrooms, common areas, and areas outside of BHHS. Defendants Watson and Hollerith knew or should have known about same but has and continues to take inadequate action to abate this unlawful discriminatory conduct.

203. If the White students at BHHS are not using the word “nigger” directly, they will say things that are suggestively offensive to the African American students at BHHS, such as “What’s up my neighbor?” and “Can I get an n-word pass?” Plaintiff finds this conduct disturbing and interferes with her ability to focus on her class work.

204. Plaintiff, K.A. did not report every instance of said racially discriminatory conduct to faculty or staff because of the lack of response and inaction in the past by Bloomfield Hills School District Superintendents and Principals.

205. In or about November of 2020, Plaintiff, K.A. was sitting in the lunchroom at a lunch table at BHHS with a few of her African American



classmates when a group of White males who were also BHHS students began throwing food at Plaintiff K.A. and her African American classmates.

206. When Plaintiff, K.A. addressed the White males throwing food at them, one of the White males stated to her “I bet you can run fast, like a linebacker, because you’re Black!” K.A. found these interactions humiliating, offensive, and interfered with her ability to focus on her classwork.

207. Plaintiff K.A. found this offensive, and this was reported to the faculty and staff who did not adequately address the racial slurs hurled at Plaintiff, K.A.

208. On or about November of 2021, it was discovered in the girls’ restroom of the second floor of BHHS that someone had written on one of the walls in one of the stalls in graffiti, “Kill all niggers!!” (**See Appendix 2**).

209. Plaintiff, K.A. learned of this racially discriminatory threat when a classmate forwarded a picture of the graffiti writing to her, which she immediately shared with Plaintiff, N.A.

210. Plaintiff, N.A. and Plaintiff, K.A. were both angered and concerned by this posting. The only action taken by BHHS to address the matter, was closing the restroom where the graffiti was found.

211. On or around November of 2021, Plaintiff, K.A. was walking down the hallway with one of her African American female friends and classmates when she saw a Black doll, wearing a purple dress and red lipstick hanging from the

second floor with White students surrounding the doll from its hanging point over the balcony and down into the first-floor common area at BHHS (**See Exhibit 1**).

212. Plaintiff, K.A. was in disbelief when she realized that it was a Black doll hanging from the balcony and was also scared because she felt that this was a representation of a lynching and a threatening message to her. This also interfered with Plaintiff's ability to focus on her classwork.

213. The Black doll hanging was later justified by the superintendent as a "science project" which did not satisfy Plaintiffs, K.A. and NA. as they were offended and uncomfortable with Plaintiff K.A. continuing to attend BHHS where they allowed such activity to proceed unaddressed.

214. On or about November 11, of 2021, Plaintiff, K.A. received a picture of a collage from one of her African American classmates which consisted of the racially discriminatory misconduct occurring at BHHS including but not limited to a picture of the graffiti writing from the BHHS girls restroom where someone wrote "Kill all niggers!!" and Snapchat post made by one of Plaintiff, K.A.'s White BHHS male classmates, N.W., that read "3 Ks a day, keep the niggers away" and was accompanied by a picture of the Ku Klux Klan (**See Appendix 5**).

215. BHHS faculty and staff had been aware of all of these postings and incidents occurring at BHHS yet failed to take adequate measures to stop this unlawful racially discriminatory conduct.

216. On or about the morning of November 15 of 2021, there was a screenshot of a threat posted to snapchat that was passed around amongst the White BHHS students that read “I am coming to give all the niggers what they deserve will all be my my slaves” and was accompanied by a gun emoji. African American students at BHHS received a screenshot of this post and shared the screenshot amongst each other which is how Plaintiff, N.A. and Plaintiff, K.A. saw the message **(See Appendix 6)**.

217. Plaintiffs, N.A. and K.A. took the threat serious, this is evidenced by the fact that the morning Plaintiffs N.A. and K.A. received the message Plaintiff, N.A. did not allow Plaintiff, KA to attend school that day because Plaintiff, N.A. felt that she had to choose between her daughter’s safety and her daughter’s education. This threat frightened Plaintiff K.A. and has caused her great emotional discomfort, has ad continues to interfere with her ability to focus on her school work.

218. On or about November 15, 2021, Plaintiff called BHHS and spoke with Principal Lupone to let them know that she was pulling Plaintiff, K.A. out of school and to express her concerns about the threat that was sent out that day.

219. Principal Lupone told Plaintiff that he would call her back later. Principal Lupone called Plaintiff, N.A. back on that same day and did not address the threat that was brought to his attention by N.A..



220. Principal Lupone's lack of concern troubled Plaintiffs, N.A. and K.A. as they feared for the safety of Plaintiff K.A. while at BHHS.

221. In the totality, BHHS' inadequate action and its failure to take the proper measures necessary to curb the discriminatory misconduct and protect its African American students and has effected Plaintiff K.A.'s confidence and has deprived her of the full use and benefit of BHHS.

222. Due to the above-described incidents and the failure of Defendants to take action and or adequate action to remove the unlawful racially discriminatory elements from the BHHS school environment, Plaintiffs fear for their safety and indeed, loss of their lives. Judicial remedies must be imposed in order to combat the unlawful racially discriminatory toxic environment at BHHS.

**Twelve (12) Additional African American Parents (Not Plaintiffs in this Action) also Charges Defendants with Deliberate Indifference to Race Discrimination at BHHS at the November 18, 2021, BHSD Board of Education Meeting (See link to November 18, 2021 Board Meeting [https://link.evo4it.com/u/e25778d6/XJe17TBj7BGk37L\\_hnsoMg?u=https%3A%2F%2Fyoutu.be%2Fdg9q4XcQ4U](https://link.evo4it.com/u/e25778d6/XJe17TBj7BGk37L_hnsoMg?u=https%3A%2F%2Fyoutu.be%2Fdg9q4XcQ4U) )**

223. At approximately, the 2:18 minute mark of the November 18, 2021, Board Meeting, parent, S.P. stated, that she was aware of what has happened in the school district over the past two weeks and as parents, she and her husband have elected not to send her children to school because "we do not think safety protocols have been put into place."



224. At approximately, the 3:33 minute mark of the Board Meeting, parent, Dr. A.M., who has two children who are tenth graders at BHHS expressed concern with their safety and what she felt was a lack of administrative response and a lack of support from the administration. Parent A.M. stated that she is seeing a pattern of behavior that is disturbing and that there is no concern for the safety of African American children at BHHS and that needs to be addressed.

225. At approximately the 8:56 minute mark, parent, Attorney T.C. stated that he has a son in the tenth grade that attends BHHS. That there are barriers to children receiving instruction at BHHS and that there has been too much discretion on whether complaints are credible before they are investigated, that it should be mandatory that threats are received and investigated in a timely fashion and that there needs to be security for the children and communication with the parents while the district is investigating. Parent T.C. stated that “you cannot just simply say there is a racial incident and then I find out later that there are threats that all Black people should be killed. I cant make a credible assessment if my kids are safe”.

226. At approximately the 13:25 minute mark, parent, J.J., stated that he has two children in the school district, one in the middle school and one in the high school. Parent, J.J. asked for equality and justice. He went on to state that the threat written on the walls at BHHS to “Kill all Niggers!” should have precipitated a

shutdown of the school for safety purposes. Parent, J.J. offered that he does not feel safe sending his child to school because there was a hate crime that occurred in the school and that Black Lives Matter.

227. At approximately the 16:02 minute mark of the Board Meeting, parent, S.C. stated that for twelve (12) years she has been coming to board meetings and speaking about the very issue that was being discussed at the meeting (racial discrimination). She asserted that several families have decided not to send their children to school, since these incidents have occurred and that children are experiencing trauma to the extent that they cannot come to school and if most of the children not attending school are from the Black community, that presents another disadvantage. She went on to state, now you have our children that are at home simply because they want to be safe, she stated that this was unacceptable. She also stated we will not leave the building tonight without hearing a plan of action and that starting the next day she needed to know what the Board planned to do. She also went on to state that students told her that they have went to teachers, counselors, administrators, and support staff in the building and they have been turned away. At the walkout she witnessed that there was young girl at the walkout saying the n-word over and over. S.C. ended by stating that the school board's policies do not address the issues that are impacting the community.

228. At approximately the 20:23 minute mark, parent, D.A., charged the

Board with inaction by stating the Board is complicit in all of the hate that has been going on and indicated that the Board has done absolutely nothing. He initially demanded accountability and indicated that the Board should shut the school down until they get a plan.

229. At approximately the 25:31-minute mark, parent, Attorney N.O., stated that there have been threats at the high school to kill all niggers and the Board has done nothing about it. N.O. also stated that the district does not know how to deal with complaints from the students, parents, or the community when they are directly with respect to race. N.O. stated that she submitted a specific race based complaint in June and when she followed up on the report she was told by Sara Fishman that she (Fishman) does not know how to conduct a race-based investigation. She further questioned Board member Siva Kumar, in that Mr. Kumar told her that he had no idea the complaint was related to race and asked how this could happen when she specifically wrote an email that it was a race-based complaint that she filed. N.O. also said that this is a complaint where I believe my son could have been treated unfairly based on his race.

230. At approximately, the 31:52 minute mark, parent, B.C., stated that she cannot understand why nothing is being done and promises to push every lever to bring systemic change to the way we do things as it pertains to our children.

231. At approximately the 34:05 minute mark, parent, S.S., a White parent,



stated she has a husband who is a Canadian diplomat, her son is a senior at BHHS and that she was excited to see the international aspect and diversity of BHHS. Parent, S.S. questioned why there was not a zero-tolerance policy.

232. At approximately the 36:48 second mark, parent, T.A., explained that this is not just about Black students but instead is about all children in the community. T.A. explained how many children stood up and expressed their fear in coming to school.

233. At approximately the 40:18-minute mark, parent, M.W. who has a daughter who is a senior at BHHS stated that the anger and frustration of parents is not just about what happened the last two weeks. She said that in the tenth grade at her first conference a teacher warned her about friendships her daughter was making with other African American students. She stated how later in literature, reading a piece that prominently featured the n-word, her daughter had to listen to students using the n-word. After complaining, her daughter was told this is how we teach it and you have to endure it. M.W. stated that in her daughter's same class there was swastika in a textbook. M.W.'s daughter took the swastika to the same teacher, and it was basically ignored. In the eleventh grade her daughter was repeatedly harassed with dress code violations for wearing exactly the same clothes that her White counterparts wore. M.W., recounted that every football game her daughter has attended she has heard the n-word being thrown around. Also, in the



eleventh grade, a White classmate told her daughter that she wondered if Black mothers during slavery loved their children, because if you really love your children, you wouldn't have kids.

234. At approximately the 48:20 minute mark, parent, A.H. stated that she has two children that attend BHHS. A.H. continued on to say that she works in manufacturing: she works with adults that were once children who went unaccounted and undisciplined continuously for their racist behavior and have turned into adults that continue to wreak havoc in the lives of other adults. She stated to the Board, that they need to do something now, and stop being afraid to stand up and say that enough is enough.

**The Acting School Board President, Jennifer Matlow Made the Following Admission in Pertinent Part at the 55:26 Minute Mark at the November 18, 2021, BHSD**

**Board of Education Meeting (See link to November 18, 2021 Board Meeting**

**[https://link.evo4it.com/u/e25778d6/XJe17TBj7BGk37L\\_hnsoMg?u=https%3A%2F%2Fyoutu.be%2Fdg9\\_q4XcQ4U](https://link.evo4it.com/u/e25778d6/XJe17TBj7BGk37L_hnsoMg?u=https%3A%2F%2Fyoutu.be%2Fdg9_q4XcQ4U)**

235. “. . . racism and other forms of demographic hatred are not new to Bloomfield. Like the rest of our country, we must fight against them every single day. Recent evidence of hate speech cannot continue. To our students and our families who were victimized, we have not fought hard enough and for that, we apologize.” The school board President's statement constitutes an admission that racism is not new to the district, which implies the boards knowledge of the

problem and that the board's action to eliminate and remedy the unlawful racial discrimination has been inadequate and ineffective and that it has not taken reasonable action in light of those circumstances to eliminate the behavior. *Vance v. Spencer Cnty. Pub. Sch. Dist.*, 231 F.3d 253, 260(6<sup>th</sup> Cir. 2000) *Davis v. Monroe Cnty Bd. Of 619 Educ.*, 526 U.S. 629, 648, 119 S. Ct. 1661, 143 L.Ed. 2d 839 (1999)

**BHHS's Student Advisory Council Identifies Historical and Current Race Discrimination at BHHS at the 86:01 Minute Mark of Meeting  
(See link to November 18, 2021 Board Meeting)**

[https://link.evo4it.com/u/e25778d6/XJe17TBj7BGk37L\\_hnsoMg?u=https%3A%2F%2Fyoutu.be%2Fdg9\\_q4XcQ4U](https://link.evo4it.com/u/e25778d6/XJe17TBj7BGk37L_hnsoMg?u=https%3A%2F%2Fyoutu.be%2Fdg9_q4XcQ4U) )

236. The student Advisory Council stated to the Bloomfield Hills School Board that there has been a rise in the frequency and intensity of crimes in the past few weeks and this is not an anomaly. Racism and homophobia have been an ongoing problem at BHHS.

237. One member of the Student Council stated that as a Black student she feels targeted, isolated and not welcomed at school.

238. The Student Council further stated that the past incidents of hate have divided and instilled fear within the school but have also caused the Black community to feel more singled out than ever.

239. Finally, the Student Council stated that there are incidents of casual racism meaning that the n-word has been thrown around by students and even teachers.

**COUNT I-CAUSE OF ACTION:**  
**42 U.S.C. § 1983 – 14th AMENDMENT**  
**EQUAL PROTECTION VIOLATION**  
**ALL DEFENDANTS**

240. Plaintiffs incorporate by reference the allegations set forth in the paragraphs above.

241. Plaintiffs as students in a school operated, managed, and supervised by Defendants, have rights under the Equal Protection clause of the Fourteenth Amendment to the United States Constitution and 42 USC §1983. Defendants had and have a duty to secure and protect these rights. Instead, Defendants condoned, tolerated, and encouraged racial harassment, intimidation and threats thereby fostering future violations.

242. Such actions and decisions of Defendants have deprived Plaintiffs of the privileges and immunities secured by the U.S. Constitution and laws in violation of 42 U.S.C. Sec. 1983. Liability and redress exist under 42 U.S.C. Sec. 1983.

243. As a direct result of the actions and conduct of Defendants, Plaintiffs suffered and continue to suffer emotional distress, loss of companionship, loss of educational opportunities, and other damages in excess of \$75,000.

244. Plaintiffs seeks compensatory damages, punitive damages, costs and attorney fees, and declaratory and injunctive relief.

**COUNT II -CAUSE OF ACTION:**  
**42 U.S.C. § 1985(3) and 1988**  
**INVIDIOUS RACIAL ANIMUS – All Defendants**

245. Plaintiffs incorporate by reference the allegations set forth in the paragraphs above.

246. At all times material herein, these Defendants agreed and conspired to violate the Plaintiff's rights secured by the 13<sup>th</sup> and 14<sup>th</sup> Amendments to the U.S. Constitution;

247. This agreement and conspiracy and the actions undertaken pursuant to this agreement and conspiracy, were so done based upon an invidious racial animus directed at the Plaintiffs;

248. As such the Defendants violated Plaintiff's rights that are guaranteed and made actionable under 42 U.S.C. Sec. 1985;

249. As a direct and proximate result of the unconstitutional acts of the Defendants as alleged herein, Plaintiffs have sustained a violation of their right to equal protection of the law and as such is entitled to damages.

**COUNT III -CAUSE OF ACTION:**  
**42 U.S.C. § 1986**  
**INVIDIOUS RACIAL ANIMUS – All Defendants**

250. Plaintiffs incorporate by reference the allegations set forth in the Paragraphs above.



251. At all times herein, Defendants knew of and were aware of the conspiracy of others to harm the Plaintiffs herein.

252. Defendants had the power and authority to prevent and/or aid in the prevention of same, yet Defendants failed, refused and/or neglected to do so in violation of 42 U.S.C. 1986.

253. As such, Defendants violated Plaintiff's rights that are guaranteed and made actionable under 42 U.S.C. Sec. 1986.

254. As a direct and proximate result of the unconstitutional acts of the Defendants as alleged herein, Plaintiffs have sustained a violation of their right to equal protection under the law.

255. As a direct result of the actions and conduct of Defendants, Plaintiffs suffered and continue to suffer emotional distress, loss of companionship, loss of educational opportunities, and other damages in excess of \$75,000.

256. As a result of Defendants violation, Plaintiffs are also entitled to their attorney fees and costs.

#### **COUNT IV – CAUSE OF ACTION**

##### **Title VI, 42 U.S.C. § 2000d – All Defendants**

257. Plaintiffs incorporate by reference the allegations set forth in the paragraphs above.

258. 42 U.S.C. § 2000d, commonly referred to as Title VI, and its

implementing regulations prohibit discrimination in a federally funded school on the basis of a student's race.

259. Specifically, 42 U.S.C. § 2000d provides that “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance,” and thereby confers a private right of action on the Plaintiffs.

260. Defendant BHHS is a recipient of federal funds.

261. Defendants knew or should have known of the denial of such benefits to Plaintiffs at BHHS on the basis of race.

262. Racial hostility permeated, and continues to permeate, BHHS with such severity and pervasiveness as to negatively impact Plaintiff’s rights under section 2000d.

263. Plaintiffs seek compensatory and punitive damages, costs, attorney fees, and declaratory and injunctive relief.

264.

#### **COUNT V- CAUSE OF ACTION**

#### **MCL 37.2302 - ELLIOTT-LARSEN CIVIL RIGHTS ACT**

265. Plaintiffs incorporate by reference the allegations set forth in the

Paragraphs above.

266. Defendants are “persons” as defined by MCL § 37.2103(g)

267. Defendants denied Plaintiffs the full and equal access to and enjoyment of BHHS’s resources, facilities, and services on account of their race.

268. Plaintiffs seek compensatory and punitive damages, costs, attorney fees, declaratory and injunctive relief.

269. Governmental immunity is not a defense in an action based in MCL 37.2302.

**COUNT VI- CAUSE OF ACTION**  
**Violation of 42 U.S.C. §1983 – Monell Liability – Bloomfield Hills School District**

270. Plaintiffs incorporate by reference the allegations set forth in the Paragraphs above;

271. At all times herein, the Bloomfield Hills School District maintained a series of policies, customs, and practices which individually and collectively constituted a moving force in the Constitutional violations asserted herein, including but not limited to:

- a. Direct humiliation, outrageous, racist, and demeaning antagonism and animus toward African Americans and in particular, African American students and staff;
- b. Failure to train its staff as to the mandatory requirement that racist

and discriminatory actions are inexcusable and will be responded to with outright discharge;

- c. Failure to train its staff with regard to the use of hostile statements and verbalisms directed against African Americans;
- d. Failure to address known complaints of actions and racially demeaning and antagonistic remarks by its White staff and students directed at African Americans;
- e. Failure, amounting to a refusal, to properly supervise, train and or discipline its staff for engaging in humiliating, outrageous, racist, and demeaning actions directed at African Americans;
- f. The refusal to provide support and protection to Plaintiffs from racially offensive humiliating conduct and threats of bodily harm and death.

272. These customs, policies, and practices of the Bloomfield Hills School District is a moving force resulting in the violation of Plaintiff's constitutionally protected rights, immunities and privileges. Defendants Patrick Watson and Charlie Hollerith individually violated Plaintiffs' rights secured by the 14th Amendment of the Constitution as set forth herein, above;

273. These practices of failing to address complaints of racially offensive behavior and threats of bodily harm and death on the basis of race within the



Bloomfield Hills School District, although not authorized by written law or express policy, is so permanent and well settled that it constitutes a custom or usage with force of law.

274. Policymaking officials within Defendant organization knew about and acquiesced in the practice at issue.

275. The toleration of said custom/practice led to the deprivation of the Plaintiff's constitutionally protected rights.

276. Defendants had constructive notice of the clear and persistent pattern of violations which Plaintiffs suffered.

277. The Defendants tacit approval of the unconstitutional conduct, such that deliberate indifference in failing to act amounted to an official policy of inaction.

278. Defendants' custom/practice was the moving force or direct causal link to the constitutional deprivation.

279. As a direct and proximate result of the unconstitutional acts of the Defendant as alleged herein, Plaintiffs have sustained a violation of their right to equal protection of the law and as a result, are entitled to damages.

**WHEREFORE**, Plaintiff request that this Court enter judgment against Defendants, providing the following relief:

- a. Damages for serious emotional injury as a result of unlawful discrimination based on race and ongoing threats of death or serious bodily harm based on race;
- b. Damages for substantial economic loss and damage, due to the districts failure to provide the same next level educational environment and opportunities offered to White students and its resulting negative effect on Plaintiffs' college admission process and opportunities;
- c. Damages for embarrassment, humiliation, outrage, mental anguish, fear and mortification, and stress.
- d. Punitive damages in the amount of \$150,000,000.00;
- e. Preliminary and Permanent Injunctive Relief;
- f. Attorney fees and costs.

November 22, 2021

Respectfully Submitted,

MUNGO & MUNGO AT LAW, PLLC

/s/ Leonard Mungo

Leonard Mungo (P-43562)

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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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S.M., a minor, by and through her Parents,  
C.M. and D.M., and C.M. and D.M. individually;  
K.A., a minor, by and through her parent, N.A.,  
And N.A. individually; M.S., a minor, by and  
through her parent, S.C., and S.C. individually;  
K.F., a minor, by and through her parent, C.F.,  
And C.F. individually; C.S. a minor by and through  
Her parent, S.S., and S.S. individually; D.A., a  
Minor by and through her parent, E.A., and E.A.  
individually; R.H., a minor by and through his  
parent, J.H., and J.H. individually

Plaintiffs,

vs.

Case No.21-cv-12707  
Hon. Mark A. Goldsmith  
Mag. Kimberly G. Altman

BLOOMFIELD HILLS SCHOOL DISTRICT,  
PATRICK WATSON and CHARLIE  
HOLLERITH in their individual and official  
Capacities

Defendants.

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**DEMAND FOR JURY TRIAL**

NOW COMES Plaintiff and hereby demands trial by jury in the  
above captioned matter.

November 22, 2021

Respectfully Submitted,

MUNGO & MUNGO AT LAW, PLLC

/s/ Leonard Mungo

Leonard Mungo (P-43562)

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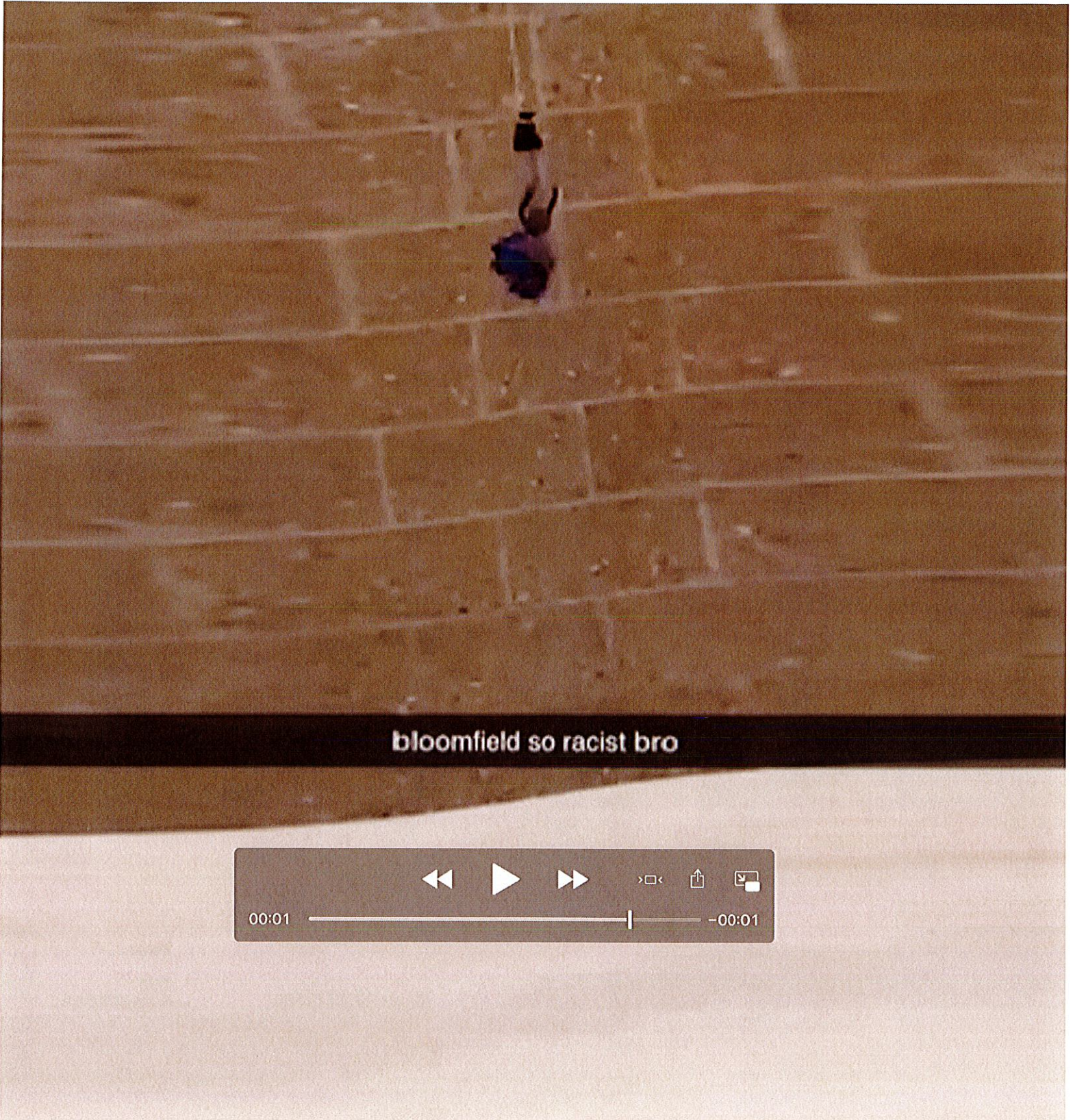
(248)792-7303 (fax)

Caseaction@Mungoatlaw.com



# Appendix 1







# **Appendix 2**



Kill All

NIGGERS!!

Yeah Fuck  
them  
all!!!



# Appendix 3



done being silent since everyone wants to  
sugar coat this shit.

this is ANOTHER threat i just found.

ALL THE NIG GERS

SHOULD BE DEAD

this is what happens at bhhs

and they aren't doing shit to stop it



# Appendix 4



LUI



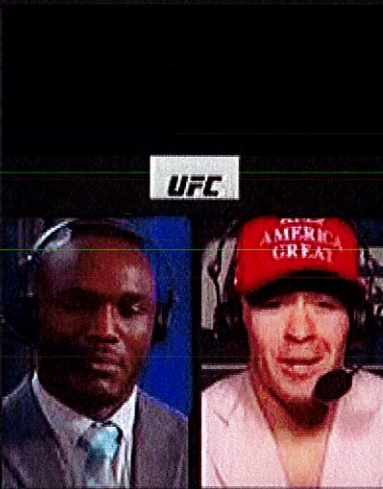
Story from Memories

While send u back

SEPTEMBER 20TH, 2020

LUI

I love seeing a white man kickin niggers asses  
Showin em that massas back





**3 K'S A DAY**

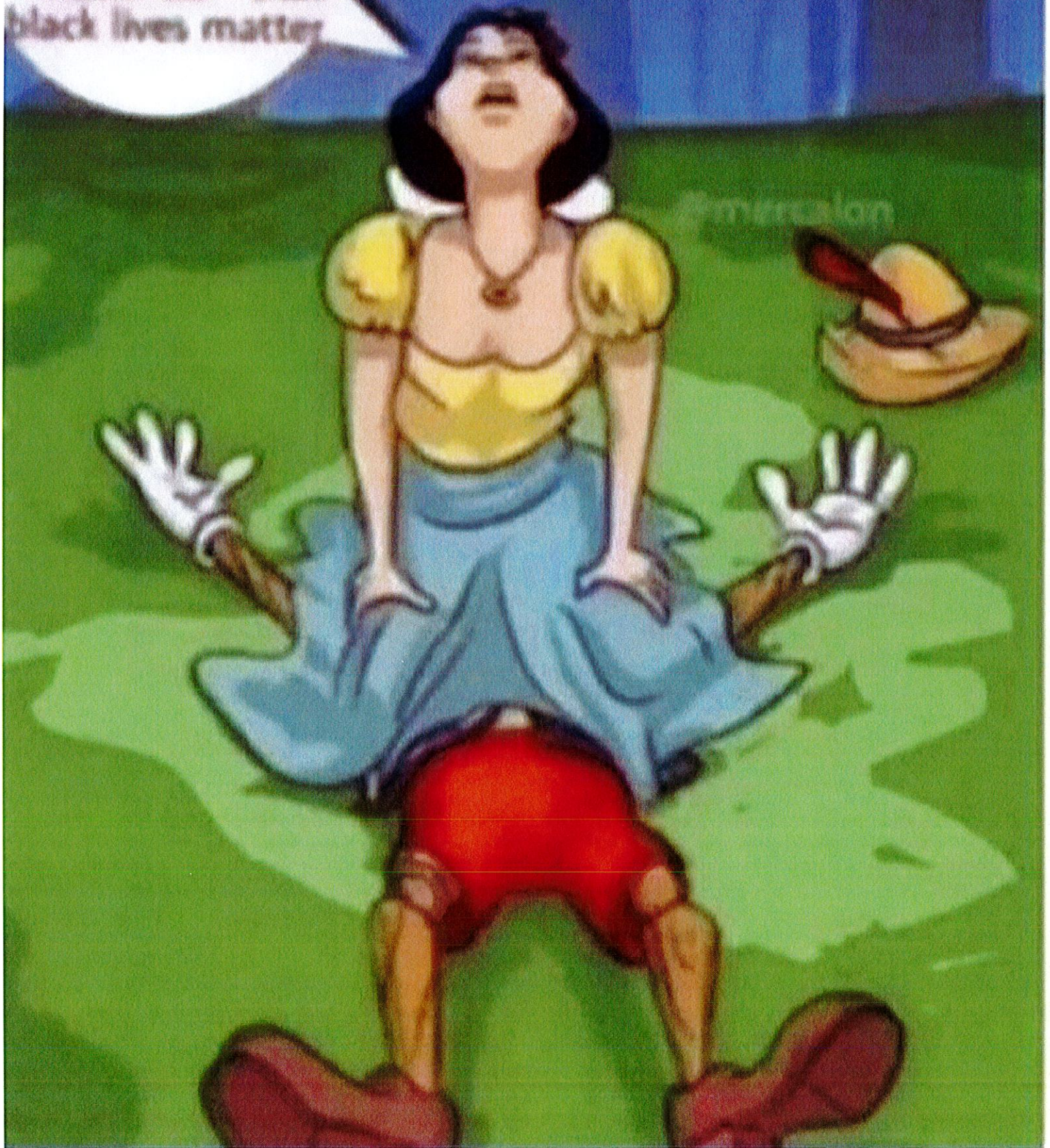
Just a friendly reminder

**KEEPS THE NIGGAS AWAY**

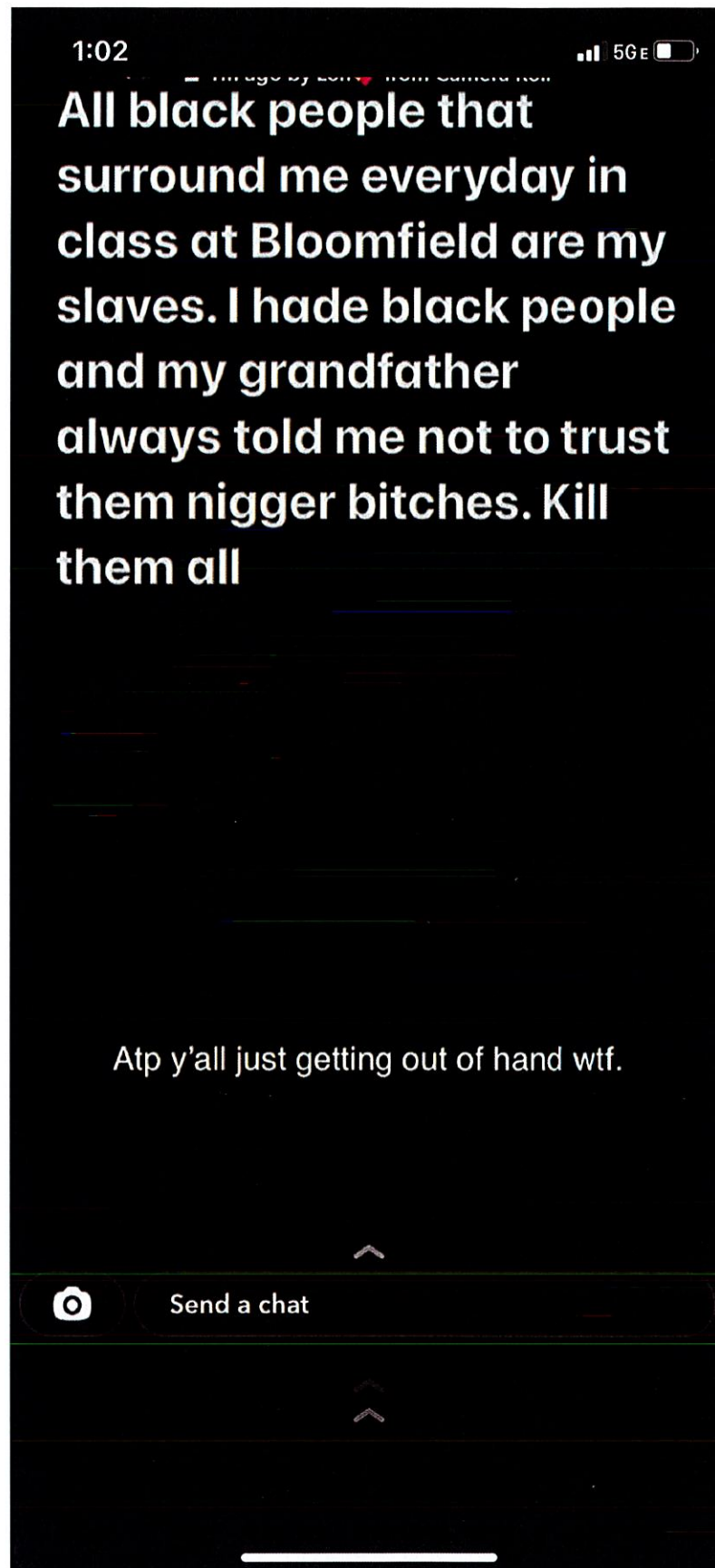




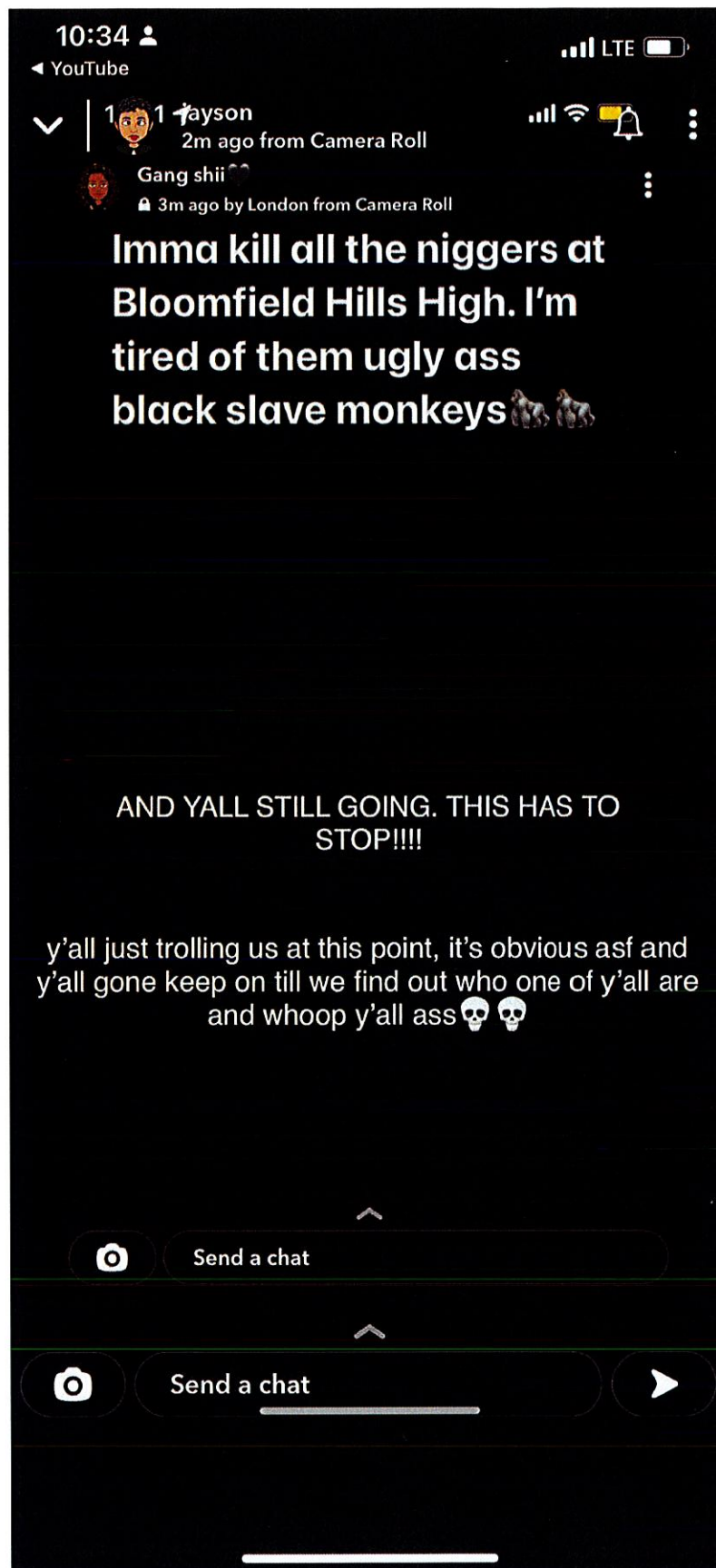
LIE TO ME  
PINOCCHIO  
LIE TO ME  
TELL ME that  
black lives matter













I hate niggers they need to be extinguished





Snapchat

LIVE



i'm chilling on discord wit the boys talking  
about ethan crumbly we are planning a  
murder

@daddyjc

#fyp #funr



xSantar



Send a chat



Home



# Appendix 5



we can't live with  
nigga



Send a chat

There prove it

Q W E R T Y U I O P

are y'all not tired?

Z X C V B N M

Send a chat

Black doll  
hanging

bloomfield so racist bro

this is act

maaaan what the fuck

Just a friendly reminder

KEEPS THE NIGGAS AWAY

are y'all not  
embarrassed?

Send a chat

KILL ALL  
NIGGERS

ARE YALL FR???

this was the threat written yesterday.



# Appendix 6



Text Message  
Today 7:34 AM

**I am coming to give all  
the niggers what they  
deserve will all be my  
my slaves 🔫**



This is serious



# Appendix 7



the press that this is false  
information



I personally found this in the  
photography room

there was also threats that they  
were going to shoot in the



# Appendix 8

ADDIE WANTS EDDIES 🍌

nigger

BENETT

ADDIE

TYLER

ELLIE

I love bhhs 🥰🥰



Send a chat



Q W E R T Y U I O P  
A S D F G H J K L

# Appendix 9



